

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY  
LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF  
ANGEION GROUP, LLC**

I, Denise Earle, hereby declare the following pursuant to 28 U.S.C. § 1746:

1. I am a Senior Project Manager with Angeion Group (“Angeion”), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.
2. The purpose of this Declaration is to summarize the communications between Angeion and objector Joseph P. Soldis (ECF No. 155).
3. Mr. Soldis contacted Angeion on January 25, 2022, stating that the online link didn’t work and requested that he be mailed a check. Angeion responded suggesting that he try submitting his claim from a different device, such as a mobile phone, if he was having issues submitting his claim. He replied with “No thank you,” and further stated “we have filed an objection.”
4. Angeion continued to try to assist Mr. Soldis with the submission of his claim, suggesting that a possible reason the claim could not be submitted was due to missing information on his claim form. Mr. Soldis replied that, “he completed everything and clicked enter.” Angeion’s records did not show a claim form was successfully completed, so we followed up again. Mr. Soldis noted “Nevermind – I will ask the Court to resolve the problem.” Angeion followed up once more on January 27, 2022, in an attempt to assist Mr. Soldis and provided him with a PDF

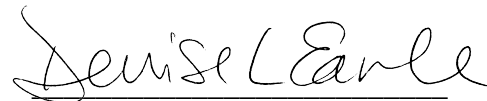
1 of the claim form which he could complete return back to us. Angeion is not aware of receiving a  
2 paper claim form from Mr. Soldis, nor do we show record of an online claim being filed.

3 5. In Mr. Soldis' objection, he noted he encountered an "error" code when attempting to  
4 enter his bank account information into the online claims form. Angeion has not been made aware  
5 that the error Mr. Soldis experienced was a common issue amongst Class Members.

6 6. Mr. Soldis' objection also indicated Class Members could only elect for a PayPal, Venmo  
7 or Direct Deposit to a bank account. The payment selection section of the online claim form also  
8 advises Class Members that "If you prefer to receive a paper check instead of a faster and more  
9 convenient option listed above, click this link."

10  
11 I hereby declare under penalty of perjury under the laws of the United States that the  
12 foregoing is true and correct.

13 Dated: March 21, 2022



DENISE EARLE